

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

**FILED**

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U.S. DISTRICT COURT  
EASTERN DIST. TENN.

BY \_\_\_\_\_ DEPT. CLERK

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

VINCENT R. JONES,

DEFENDANT.

No. 3:06-CR-28

Judge Phillips

AGREED FACTUAL BASIS

The United States of America, by and through James R. Dedrick, Acting United States Attorney for the Eastern District of Tennessee, and the Defendant, VINCENT R. JONES, and his attorney, Scott Green, hereby stipulate that the following facts in support of the guilty plea are true and accurate.

1. During or about July 2000 through during or about November 2001, JONES owned and operated Best Deals Auto Sales, a business engaged in the sale of new and used automobiles to the general public. During that time, Best Deals Auto Sales was located at 1818 Middlebrook Pike, Knoxville, Tennessee.

2. During or about July 2000 through during or about November 2001, JONES and Ronnie Rodgers (Rodgers) agreed that JONES would assist Rodgers with purchasing from other new car dealers in Knoxville, Tennessee: (a) 2002 Lexus SC 430, VIN JTHEN48Y520010697; (b) 2000 Cadillac Escalade, VIN 1GYEK63R8YR22864; and (c) 2000 Chrysler Sebring JXI, VIN

3C3EL55H3YT288480.

3. Rodgers and JONES agreed that JONES would take the necessary steps to title the above-referenced vehicles in the names of other persons, even though JONES knew that Rodgers had supplied the purchase money for each vehicle.

4. As part of their agreement, after Rodgers supplied to JONES the purchase money for each vehicle, JONES and Rodgers agreed that the above-listed vehicles would be purchased by and initially titled in the name of Best Deals Auto Sales, and that JONES would then transfer the title to each vehicle to the name of one of Rodgers's family members, thereby concealing Rodgers's financial expenditure and interest for, and in, each vehicle.

5. As part of their agreement, to fund the purchases of the above-listed vehicles, Rodgers would supply JONES with trade-in vehicles and United States currency. The cash would be used to cover the difference between the new vehicle purchase price and any trade-in allowance.

6. As part of their agreement, and acting as Rodgers agent, JONES would deposit the United States currency that Rodgers gave him into AmSouth Bank account number 5001332730, held in the name Vincent R. Jones d/b/a Best Deals Auto Sales. Then, to pay for the above-listed vehicles, JONES would write a check drawn on that AmSouth Bank account to the new car dealership.

7. During or about July 2000 through during or about November 2001, both JONES and Rodgers knew that federal law requires a domestic financial institution to complete a Currency Transaction Report (CTR) and to file the CTR with the United States Department of Treasury when an individual makes a single deposit of more than \$10,000 in United States currency. Both JONES and Rodgers knew that completion of the CTR would require JONES to identify Rodgers as the source of the cash.

8. Accordingly, during or about July 2000 through during or about November 2001, when Rodgers provided JONES with more than \$10,000 in United States currency for a vehicle purchase, JONES and Rodgers agreed that JONES would structure the depositing of the cash purchase-money into the Best Deals Auto Sales' AmSouth Bank account in Knoxville, Tennessee to avoid the CTR monetary threshold. JONES and Rodgers made this agreement at Best Deals Auto Sales at 1818 Middlebrook Pike, Knoxville, Tennessee.

9. JONES and Rodgers completed the object of their agreement when JONES, in furtherance of their agreement to avoid the CTR requirement, structured the deposits of the following cash amounts provided to JONES by Rodgers for new car purchases into AmSouth Bank account number 5001332730, held in the name Vincent R. Jones d/b/a Best Deals Auto Sales, in Knoxville, Tennessee, on or about the following dates:

- a. For the approximately \$13,000 in United States currency, after trade-in allowance, required to purchase the 2002 Lexus SC430, VIN JTHEN48Y520010697, from Lexus of Knoxville in Knoxville, Tennessee, Jones made the following structured deposits into Knoxville, Tennessee AmSouth Bank Account number 5001332730-\$5,500 on 11/2/01, \$1,400 on 11/6/01, \$1,100 on 11/8/01, and \$5,000 on 11/13/01;
- b. For the approximately \$23,000 in United States currency, after trade-in allowance, required to purchase the 2000 Cadillac Escalade, VIN 1GYEK63R8YR22864, from Airport Olds-Cadillac, Inc. in Knoxville Tennessee, Jones made the following structured deposits into Knoxville, Tennessee AmSouth Bank Account number 5001332730-\$6,200 on 9/5/00, \$9,000 on 9/6/00; \$5000 on 9/6/00, and \$2,900 on 9/7/00; and
- c. For the approximately \$29,000 in United States currency required to purchase the 2000 Chrysler Sebring JXI, VIN 3C3EL55H3YT288480, from Harry Lane Chrysler in Knoxville, Tennessee, Jones made the following structured deposits into Knoxville, Tennessee AmSouth Bank Account number

5001332730-\$9,000 on 7/24/00, \$5490 on 7/24/00,  
\$5475 on 7/25/00, and \$9,000 on 7/26/00.

10. At all material times stated herein, AmSouth Bank was a  
domestic financial institution.

So stipulated and agreed.

JAMES R. DEDRICK  
Acting United States Attorney

3/2/06  
Date

By: F M Hamilton III  
F. M. Hamilton III  
Assistant United States Attorney

3/2/06  
Date

Scott Green  
Scott Green  
Attorney for Defendant

3-2-06  
Date

Vincent R Jones  
Vincent R. Jones  
Defendant